

License Amendments

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License Amendments

10 CFR 50.90

- 10 CFR 50.59(c)(1)-Changes may be made without obtaining a license amendment per 50.90 only if:
 - (i) A change to the technical specifications incorporated in the license [Appendix A] is not required
 - (ii) does not meet any of the criteria in ... (c)(2)
- Application for amendment 50.90
- Issuance of Amendment 50.92
- Noticing 50.91 – not required for most RTR

License Amendments Submittal Requirements

- 10 CFR 50.4 - All license amendment requests and supplemental correspondence must be signed and submitted under oath or affirmation including:
 - Initial request
 - Supplemental information
 - Response to a letter from the NRC (RAI)
 - Response to a conversation or email with the NRC provided the question is restated in the response (public disclosure requirement)
 - May be volunteered for clarification

License Amendments Content

- Per 10 CFR 50.90 must fully describe the changes desired, and following as far as applicable, the form prescribed for the original application
 - What is being changed?
 - What is the relation to safety?
 - How is the safety basis affected?
 - What makes the change acceptable?
(especially when safety margin is decreased)

License Amendments Safety Analysis

- If equipment-related, how does it currently function and describe how that function is affected by the change
- If new equipment or interface is included describe potential failures
 - Build “What if” scenarios
 - Consider partial failures
 - Consider impact to other equipment or ability to operator to respond (is equipment used to make operational decisions?)
 - Discuss redundancy impact (defense in depth)

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WHY?

NRC needs to determine:

- Do the bases and assumptions make sense?
- Can the information be independently verified?
 - quantifiable - perform separate calculation/analysis
 - engineering judgment - consistent with current practices
- Is the impact to safety is acceptable
(FINE PRINT: reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner)

License Amendments TS Revisions

- Marked up original TS
- Only replace page(s) affected by change
(with change bars in margin)
- Cannot change other sections of TS
without specifically addressing in request
letter (includes administrative changes)
- Wholesale replacement of all TS pages requires
careful review for unintended changes

License Amendment Opportunities

- Original bases may need to be more robust
- Formatting less than ideal
- TS wording may include ambiguities
- Equipment function descriptions can be enhanced
- TS may contradict other sections

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Current Status

- License renewal included attempt to “modernize” TS and bases
- ANS 15.1/NUREG-1537 includes allowance for action statements related to Limiting Conditions for Operation
- Equipment LAR are very infrequent

Questions ?

